

EXHIBIT 125

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NIKE, INC.,)
Plaintiff,)
)
)
vs.) Case No.:
) 1:22-cv-00983-VEC
STOCKX LLC,)
Defendant.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY
VIDEO-RECORDED 30(b)(6) DEPOSITION OF
MELANIE HARRIS
Portland, Oregon
Thursday, January 19, 2023; 9:43 a.m.

REPORTED BY:
Victoria A. Guerrero, CSR, RPR, CRR
Job No. 5593367
Pages 1 through 340

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BE IT REMEMBERED that, pursuant to Federal
Rules of Civil Procedure, the deposition of MELANIE
HARRIS taken on behalf of the Defendant was taken
before Victoria A. Guerrero, Certified Shorthand
Reporter, Registered Diplomate Reporter, Registered
Merit Reporter, and Certified Realtime Reporter, on
Thursday, January 19, 2023, commencing at the hour
of 9:43 a.m., at Stoel Rives LLP, 760 SW Ninth
Avenue, Suite 3000, in the City of Portland, County
of Multnomah, State of Oregon.

1 Q Okay. When did Nike first begin exploring,
2 entering the Metaverse or digital goods space?

3 A [REDACTED]
4 [REDACTED]

5 Q And what was your role in that process?

6 A So I lead strategy at Nike.

7 Q Uh-huh.

8 A We began looking at, as we always do,
9 future opportunities to innovate and serve our
10 consumers in a Nike right way. My role was first
11 tasking a team to continue to do that in the course
12 of their work.

13 Second, taking the initial proposal from
14 the team on this being an area that we should
15 consider. Third, guiding the team through the work
16 to consider it in a meaningful and thoughtful way.
17 And, fourth, sharing the proposal with those more
18 senior to me, principally our CEO.

19 Q You said you lead strategy at Nike. What
20 is your formal title at Nike?

21 A VP of strategy and development.

22 Q How long have you been in that role?

23 A Since 2019.

24 Q Did you work at Nike prior to?

25 A No.

1 deck. But without having looked at it, I probably
2 wouldn't have remembered the specifics.

3 Q Yeah. I guess, what were you refreshed as
4 to when you looked at the deck?

5 A You know, that he saw it as another way for
6 us to -- [REDACTED]

7 [REDACTED]
8 Q Okay. I'm going to flip to page 11 of the
9 deck. There seems to be page numbers at the bottom
10 right-hand corner. And here the slide says, [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 Do you know what this idea was from him?

14 A As I read it today, [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q Did you consider any of these ideas?

18 A Certainly the first one.

19 Q Any of the others?

20 A The third one.

21 Q What about two or four?

22 A No.

23 Q [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]

2 Why didn't you consider that idea?

3 A It's not our line of business.

4 Q What specifically is not your line of
5 business?

6 A There are elements in the subtext. So
7 being able to buy Nike product is something. [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 A Correct.

14 Q [REDACTED]

15 A That is what I mean.

16 Q As part of Nike Virtual Studios and the
17 .swoosh platform that Nike recently launched, is
18 there a plan or have there been discussions about
19 potentially allowing owners of virtual creations to
20 trade them with each other?

21 A [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 A Is it accurate that that's what it says?
2 It is accurate that that's what it says. That is
3 not Nike's strategy.

4 Q [REDACTED]
[REDACTED]

6 A No.

7 Q [REDACTED]
[REDACTED]
[REDACTED]

10 A No.

11 Q [REDACTED]
[REDACTED]

13 A Have I heard any? I can tell you why. One
14 of the key tenants of our strategy is a --
15 maintaining the integrity, strength, and love of our
16 brand. And part of that relies on us having a clear
17 and trusted relationship with our consumers.

18 [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

-- well, I guess, I'll